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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF ALEXANDER
FRAWLEY ISO PLAINTIFFS'
OPPOSITION TO GOOGLE'S MOTION
TO EXCLUDE PLAINTIFFS' EXPERT
PROFESSOR BRUCE SCHNEIER (DKT.
474)**

The Honorable Richard Seeborg
Courtroom 3 – 17th Floor
Date: May 15, 2025
Time: 1:30 p.m.

DECLARATION OF ALEXANDER FRAWLEY

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' Opposition to Google's Motion to Exclude Plaintiffs' Expert Bruce Schneier (Dkt. 474).

3. Attached hereto as **Exhibit 1** is a true and correct copy of a September 8, 2022 order in the *State of Arizona v. Google LLC* case. *State of Az. v. Google LLC*, CV 2020-006219 (Sup. Ct. Az. Maricopa Cty. Sept. 8, 2022).

4. Attached hereto as **Exhibit 2** is a true and correct copy of a document that Google produced in discovery, labeled GOOG-RDGZ-00173562.

5. Attached hereto as **Exhibit 3** are true and correct excerpts from the deposition of Plaintiffs' expert Bruce Schneier, taken by counsel for Google on July 10, 2023.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document that Google produced in discovery, labeled GOOG-RDGZ-00168911.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a document that Google produced in discovery, labeled GOOG-RDGZ-00015824.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a document that Google produced in discovery, labeled GOOG-RDGZ-00017622.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of April 2025, at New York, New York.

/s/ Alexander Frawley